## **HCP Scoping Meetings**

## **Primary Concerns**

- It's too early in the process to be developing an HCP. It will be more appropriate to develop HCP's in Phase 3 where specific projects are identified.
- The level of detail in a programmatic EIS/EIR does not provide sufficient certainty for a "No Surprises" policy.
- An HCP will provide assurances for water users; however, the ecosystem has no similar assurances.
- A similar level of "no surprises" is needed for federal contractors as will be provide for the state and others.
- Adaptive management is a critical component of an HCP; however, some believe it is inconsistent with a "no surprises" policy.
- The length of term for a "no surprises" policy must be defined. Some stakeholders believe it should be short term to incorporate adaptive management, and others believe it should be long term.
- How will funding for ecosystem actions be assured in an HCP?
- The burden of proof to show "extraordinary circumstances" to make changes in an HCP always falls to the ecosystem proponents. Burden of proof should be shared.
- Public participation must be incorporated up front in the HCP development.